

EXHIBIT C
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.;

3:17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF JEFF HOLDEN

SAN FRANCISCO, CALIFORNIA

TUESDAY, AUGUST 15, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2660984

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1 A No. 11:07

2 Q And by December of 2015, [REDACTED] 11:08

3 [REDACTED] 11:08

4 [REDACTED] 11:08

5 [REDACTED] 11:08

6 A [REDACTED] 11:08

7 [REDACTED] 11:08

8 Q Okay. 11:08

9 A [REDACTED] 11:08

10 [REDACTED] 11:08

11 Q So, your recollection is that, in this 11:08

12 entire -- in the entire time frame we've been 11:08

13 discussing so far, which is 2015, [REDACTED] 11:08

14 [REDACTED] 11:08

15 A [REDACTED] 11:08

16 Q Okay. 11:08

17 A [REDACTED] 11:08

18 [REDACTED] 11:08

19 Q Okay. And, do you recall [REDACTED] 11:08

20 [REDACTED] 11:08

21 A [REDACTED] 11:08

22 Q Are there documents that reflect [REDACTED] 11:08

23 A [REDACTED] 11:08

24 [REDACTED] 11:09

25 Q Are there -- is there -- if I wanted to try 11:09

1 to go find [REDACTED] 11:09
2 [REDACTED] 11:09
3 [REDACTED] 11:09
4 A I mentioned [REDACTED] That was [REDACTED] 11:09
5 [REDACTED] 11:09
6 [REDACTED] 11:09
7 You'll later find a reference to [REDACTED] 11:09
8 [REDACTED] 11:09
9 [REDACTED] 11:09
10 [REDACTED] 11:09
11 Q [REDACTED] 11:09
12 A [REDACTED] 11:09
13 Q And so, when you say they later [REDACTED] 11:09
14 [REDACTED] 11:09
15 [REDACTED] 11:09
16 A They -- we were -- we were looking in 11:09
17 [REDACTED] 11:09
18 [REDACTED] 11:09
19 Q Okay. 11:09
20 A [REDACTED] 11:09
21 Q And, as of December of 2015, Uber was [REDACTED] 11:09
22 [REDACTED] 11:10
23 A [REDACTED] 11:10
24 MS. ROBERTS: All right. Let's take our 11:10
25 break. 11:10

1 vehicle technology sort of when you first had your 16:38
2 first contact with Mr. Levandowski, and then before 16:38
3 you started more active negotiations. 16:38

4 Focusing on the time when you stepped away 16:38
5 from the program, can you describe for me the state of 16:38
6 Uber's autonomous vehicle technology? 16:38

7 A In what terms? 16:38

8 MR. BRILLE: Object to form. 16:38

9 MS. ROBERTS: Q. At that time, how far away 16:38
10 was Uber from its planned launch? 16:38

11 A [REDACTED] 16:38

12 [REDACTED] 16:38

13 [REDACTED] 16:38

14 Q And so, was that the date you previously 16:38
15 testified to, [REDACTED] I think? 16:38

16 A That's what I remember. But I -- I saw 16:38
17 something in the documentation that talked about it 16:39
18 being [REDACTED] 16:39

19 [REDACTED] 16:39

20 [REDACTED] 16:39

21 Q It certainly didn't -- [REDACTED] 16:39
22 [REDACTED] right? 16:39

23 A [REDACTED] 16:39

24 [REDACTED] We have -- as 16:39

25 you -- as you know, there are -- from the media, 16:39

1 there -- there are vehicles on the road, you know, 16:39
2 currently in multiple cities, but [REDACTED] 16:39
3 [REDACTED] 16:39
4 Q And [REDACTED] that 16:39
5 [REDACTED] correct? 16:39
6 A I mean, it would initially be a safety 16:39
7 driver, but then it would transition to no safety 16:39
8 driver for those specific routes I talked about. 16:39
9 Q And, as of when you shifted away from being 16:39
10 involved in the autonomous vehicle program, were 16:39
11 you -- [REDACTED] 16:39
12 [REDACTED] 16:39
13 A Yes. 16:39
14 MR. BRILLE: Object to form. 16:39
15 THE WITNESS: Oh, yes, yes. 16:39
16 MS. ROBERTS: Q. As of when you shifted away 16:39
17 from the autonomous vehicle program, [REDACTED] 16:39
18 [REDACTED] 16:40
19 A [REDACTED] 16:40
20 Q As of the time that [REDACTED] 16:40
21 [REDACTED] 16:40
22 [REDACTED] 16:40
23 A Not that I'm aware of. But I think the 16:40
24 answer is definitely no, because I would know. 16:40
25 I mean, there's -- the reason that's the 16:40